

1 Vanessa R. Waldref
2 United States Attorney
3 Eastern District of Washington
4 Jeremy J. Kelley
5 Frieda K. Zimmerman
6 Assistant United States Attorneys
7 Post Office Box 1494
8 Spokane, WA 99210-1494
9 Telephone: (509) 353-2767
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12 UNITED STATES DISTRICT
13 FOR THE EASTERN DISTRICT OF WASHINGTON
14

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 vs.

18 ANDREI STEPHANOVICH
19 BORGHERIU,

20 Defendant.

No. 4:22-CR-6040-SAB

UNITED STATES' SECOND
AMENDED EXHIBIT LIST

21
22 The United States of America, by and through Vanessa R. Waldref, United
23 States Attorney for the Eastern District of Washington, and Frieda K. Zimmerman
24 and Jeremy J. Kelley, Assistant United States Attorneys for the Eastern District of
25 Washington, respectfully submits the United States' First Amended Exhibit List of
26 prospective exhibits for the above-referenced trial. United States reserves the right
27 to present additional exhibits that may become necessary before and during the
28 course of trial.

UNITED STATES' SECOND AMENDED EXHIBIT LIST – 1

This Second Amended Exhibit List adds exhibit 37, a home inspection work order. The other exhibits have not been amended.

Ex. No.	Admitted	Description	Bates Numbers
1		Rapid Finance Application Details	90000001–1.11
2		Rapid Intake Form Data Lookup	90000004–4.05
3		Driver’s License	90000029
4		Business License	90000027
5		Rapid Finance Credit Report Details	90000003–3.03
6		SBA Emails	90000013, 90000008, 90000018, 90000009, 90000017, 90000019, 90000012, 90000014, 90000015, 90000016, 90000011
7		Loan Authorization and Agreement	90000025–25.24
8		DocuSign Certificate of Completion	90000007
9		Signature Card	50000013
10		August 2021 Statement	50000014.027–14.036
11		September 2021 Statement	50000014.037-14.046
12		October 2021 Statement	50000014.047-14.056
13		Image of 1710 Sunshine Ave	10000136
14		Lease/Rental Agreement	10000141–141.05
15		Residential Purchase and Sales Agreement	50000018.109-18.117
16		Ticor Title Emails	50000019-19.14
17		Order Sheet	50000018.232-18.237
18		Closing Escrow Instructions	50000018.040-18.044
19		Schedule A	50000018.078

Ex. No.	Admitted	Description	Bates Numbers
20		Final Master Statement	50000018.002
21		Wiring Information	50000018.096
22		Incoming Wire Receipt	50000018.007
23		\$1.00 Check	50000018.005
24		Statutory Warrant Deed	50000018.051–18.052
25		Quit Claim Deed	50000018.037
26		Home Inspection Report	10000083-83.25
27		Interview Audio	10000139
28		Interview Transcript	10000140-140.12
29		Advice of Rights	10000043
30		1040 Tax Return 2018	700000003-3.034
31		1040 Tax Return 2019	700000003.035-3.053
32		1040 Tax Return 2020	700000003.054-3.072
33		1040 Tax Return 2021	700000003.073-3.098
34		1040 Tax Return 2022	700000003.099-3.122
35		Fedwire Funds Message	50000021.04
36		Visual Inspection Agreement	10000071-71.04
37		Home Inspection Work Order	10000162–162.2

RESPECTFULLY SUBMITTED this 7th day of February, 2025.

Vanessa R. Waldref
United States Attorney

/s/ Jeremy J. Kelley
Jeremy J. Kelley
Frieda K. Zimmerman
Assistant United States Attorneys

CERTIFICATE OF SERVICE

I hereby certify that on February 7, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which in turn automatically generated a Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the CM/ECF system. The NEF for the foregoing specifically identifies recipients of electronic notice.

s/ Jeremy J. Kelley
Jeremy J. Kelley
Assistant United States Attorney